

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

JP MORGAN CHASE BANK, NATIONAL
ASSOCIATION,

Plaintiff,

v.

ROBERT KOWALSKI, AKA ROBERT M.
KOWALSKI; UNKNOWN OWNERS AND
NON-RECORD CLAIMANTS; CHICAGO
TITLE LAND TRUST COMPANY s/i/i TO
BRIDGEVIEW BANK GROUP FKA
BRIDGEVIEW BANK AND TRUST COMPANY,
AS TRUSTEE UNDER TRUST AGREEMENT
DATED APRIL 24, 1993 AND KNOWN AS
TRUST NUMBER 1-2228; MARTHA
PADILLA; FEDERAL DEPOSIT INSURANCE
CORPORATION, AS RECEIVER FOR
WASHINGTON FEDERAL BANK FOR
SAVINGS,

Defendants.

Case No. 1:19-CV-05770

1512 W. Polk Street
Chicago, IL 60607

JOINT STATUS REPORT ON DISCOVERY

The parties hereby jointly submit this Status Report on Discovery pursuant to Court Order.

(See Dkt. 166).

A. PROGRESS ON DISCOVERY

At the remote deposition of Defendant Martha Padilla completed on September 27, 2021, she agreed to produce documents that she is now the sole beneficiary of the subject property. No such documents have been produced as of this filing.

B. EXPERT WITNESS DISCOVERY

This pertains solely as to the principal lawsuit and not the third-party complaint. The parties propose that Martha Padilla disclose by November 12, 2021 any expert witness(es) she intends to

use at trial to present evidence under Federal Rule of Evidence 702, 703 or 705, including providing a written report in accordance with Fed. R. Civ. P. 26(a)(2). Any party may depose such expert witness(es) presented by Martha Padilla by December 3, 2021. Any party may disclose any rebuttal expert witness(es), including providing a written report, by December 31, 2021. Any deposition of a rebuttal witness shall be conducted by January 25, 2022.

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SUBMITTED JOINTLY AND BY AGREEMENT OF THE PARTIES:

Date: October 15, 2021

**PLAINTIFF JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION**

/s/ Shana A. Shifrin

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DEFENDANT MARTHA PADILLA

/s/ Joseph R. Ziccardi

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**DEFENDANT FEDERAL DEPOSIT
INSURANCE CORPORATION,
AS RECEIVER FOR WASHINGTON
FEDERAL BANK FOR SAVINGS**

/s/ James M. Dash

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**THIRD-PARTY DEFENDANT FIRST
MIDWEST BANK**

/s/ Adam B. Rome

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